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Nevada Bar No. 14853

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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHARLIE YOUNG,)
Plaintiff,) Case No.: 2:22-cv-00420-VCF
vs.)
KILIGO KIJAKAZI,) **UNOPPOSED MOTION FOR EXTENSION OF**
Acting Commissioner of Social Security,) **TIME TO FILE CERTIFIED**
Defendant.) **ADMINISTRATIVE RECORD AND ANSWER**
) **(FIRST REQUEST)**
)

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by
2 and through her undersigned attorneys, hereby moves for a 30-day extension of time to file the Certified
3 Administrative Record (CAR) and answer to Plaintiff’s Complaint. The CAR and answer to Plaintiff’s
4 Complaint are due to be filed by May 9, 2022. This is the Commissioner’s first request for an extension
5 of time.

6 Defendant submits that good cause exists for this extension request. The undersigned has
7 communicated with the Office of Appellate Operations (OAO), which is responsible for preparing and
8 certifying the CAR. OAO informed the undersigned that it is experiencing some issues with the
9 transcription of the administrative hearing, but it anticipates that with a 30-day extension, the CAR can
10 be completed.

11 Accordingly, Defendant requests an extension in which to respond to the Complaint until June 8,
12 2022. If Defendant is unable to produce the certified administrative record necessary to file an Answer in
13 accordance with this Order, Defendant shall request an additional extension prior to the due date.

14 On April 27, 2022, the undersigned conferred with Plaintiff’s counsel, who has no opposition to the
15 requested extension.

16 It is therefore respectfully requested that Defendant be granted an extension of time to file the CAR
17 and answer to Plaintiff’s Complaint, through and including June 8, 2022.

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1 Dated: April 27, 2022
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CHRISTOPHER CHIOU
Acting United States Attorney

8 /s/ Allison J. Cheung
9 ALLISON J. CHEUNG
10 Special Assistant United States Attorney
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 4-28-2022

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Marc V. Kalagian
marc.kalagian@rksslaw.com
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 27, 2022

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney